

## MEMORANDUM ENDORSED



Epstein Drangel LLP

60 East 42nd Street, Suite 2520, New York, NY 10165

T: 212.292.5390 • E: mail@ipcounselors.com

www.ipcounselors.com

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December 21, 2021

### VIA ECF

Hon. Gregory H. Woods  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

**Re: *Palace Skateboards Group, et al. v. Aimeey, et al.***  
**Civil Case No. 21-cv-3951**  
**Letter Request for Extension of Deadline to File Default Judgment Motion**

Dear Judge Woods,

We represent Plaintiffs Palace Skateboards Group and GSLT Holdings Limited (“Plaintiffs”), in the above-referenced matter (the “Action”).<sup>1</sup> On October 29, 2021 the Court held a conference and subsequently entered an order on November 1, 2021 directing Plaintiffs to file their order to show cause as to why a default judgment should not be entered (“Default Judgment Motion”) by no later than December 23, 2021. (Dkt. 26). Earlier today at an oral argument in a similar matter, *Smart Study Co., Ltd. v. Acuteye-US, et al.*, Case No. 21-cv-5860, the Court posed a question regarding Article 15 of the Hague Convention and its application with respect to entering default judgment against Defendants. At this time, Plaintiffs respectfully request a short extension of time to file their Default Judgment Motion against the remaining Defendants so that they can adequately research and address the effect of Article 15 of the Hague Convention, if any, on this Court’s ability to enter a Judgment against Defendants in their Default Judgment Motion. In accordance with Your Honor’s Individual Rules of Practice, Plaintiffs submit the following:

1. **Original Deadline:** December 23, 2021
2. **The number of previous requests for adjournment:** None, this is the first request for an extension of time to file Plaintiffs’ Default Judgment Motion.
3. **The reason for the current request:** Plaintiffs respectfully request an extension of time so that they can adequately research and address Article 15 of the Hague Convention in their Default Judgment Motion.
4. **Whether the adversary consents:** All of the Defendants remaining in this action are currently in default, thus Plaintiffs did not seek their consent.
5. **Proposed alternative dates:** Plaintiffs respectfully propose filing their Default Judgment Motion by no later than January 18, 2021.

<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiffs’ Complaint or Application.

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We thank the Court for its time and attention to this matter.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

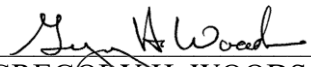
BY: /s/ Danielle S. Futterman  
Danielle S. Futterman (DY4228)  
dfutterman@ipcounselors.com  
60 East 42nd Street, Suite 2520  
New York, NY 10165  
Telephone: (212) 292-5390  
Facsimile: (212) 292-5391  
*Attorneys for Plaintiffs*

Application granted. The Court expects that any motion for default judgment will be filed on or before January 18, 2022.

The Clerk of Court is directed to terminate the motion currently pending at Dkt. No. 30.

SO ORDERED.

Dated: December 22, 2021  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge